

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FILED

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U.S. DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

APOLLO ENTERPRISE IMAGING CORP.)

Plaintiff,)

v.)

JAMES MICHAEL CONYERS,)

Defendant.)

Civil No. 1:19-cv-1603 (LMB/MSN)

**PLAINTIFF'S MOTION FOR LEAVE TO SUBSTITUTE REDACTED DOCUMENTS
FOR THOSE PREVIOUSLY FILED UNDER SEAL**

Pursuant to Local Rule 5 Plaintiff Apollo Enterprise Imaging Corp. ("Apollo" or "Plaintiff") by and through undersigned counsel, hereby files this Motion for Leave to Substitute Redacted Documents for Those Previously Filed Under Seal (the "Motion").

The above-captioned case was originally filed under seal pursuant to the Defend Trade Secrets Act, 18 U.S.C. § 1836(b)(2)(A)(ii)(VIII), and Local Rule 5. Now that the purpose of the sealing of the case file has run its course, and in accordance with the Court's Show Cause order issued on January 6, 2020, Plaintiff agrees that the case should be unsealed generally, but Plaintiff respectfully requests that certain parts of the record be permanently sealed due to the highly confidential nature of the information contained therein, which if disclosed would cause significant competitive harm to Plaintiff.

In connection with this Motion, Plaintiff seeks leave to substitute a redacted version of the following documents for those previously filed under seal: (1) Complaint; (2) Exhibits D & F to the Complaint; (3) Newburger Affidavit filed in Support of Plaintiff's *Ex Parte* Application for Civil Seizure and Motion for Temporary Restraining Order (the "First Newburger Affidavit"); (4) Exhibits D & F to the Newburger Affidavit; (5) Memorandum in Support of *Ex Parte* Motion for TRO; and (6) Exhibits B, C, E, F, G, and H to the Affidavit of Bobby Williams filed in Support of Plaintiff's *Ex Parte* Motion for

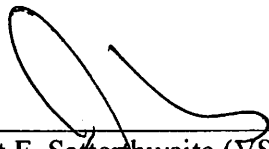
TRO (the "Williams Affidavit"). The proposed redacted documents are filed contemporaneously with Plaintiff's Motion.

In support of its Motion, Plaintiff relies on its Memoranda of Law in Support and accompanying documentation, the Notice of Filing a Motion to Seal, and the Proposed Order filed herewith.

Respectfully submitted,

January 10, 2020

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